

Exhibit 3

1 (Plaintiff's Exhibit No. 4 marked for
2 identification.)

3 **QUESTIONS BY MR. LANGENFELD:**

4 Q Would you identify what you have in front of
5 you as Exhibit 4? What is that?

6 A This is the organizational chart for Centene
7 Corporation and all of its subsidiaries.

8 Q And did you actually create this chart?

9 A Yes, I did.

10 Q Do you see on that chart, Centene Management
11 Company?

12 A Yes.

13 Q The one that is your actual employer?

14 A Yes.

15 Q Would you point that out to me?

16 A Right here.

17 Q Okay. In fact, go ahead and circle that, if
18 you would.

19 A Sure.

20 Q And so that is your actual employer.

21 A Yes.

22 Q Now, that appears to be a subsidiary of
23 Centene Corporation; correct?

24 A Correct.

25 Q And it's not a subsidiary of any other

1 entity within the Centene family?

2 **A** Correct.

3 **Q** And Centene Management Company has
4 subsidiaries as well; is that right?

5 **A** Correct.

6 **Q** One of which is CMC Real Estate Company?

7 **A** Yes.

8 **Q** And Centene Plaza, LLC?

9 **A** Yes.

10 **Q** Is that the building we're in right now?

11 **A** The building that we're in right now is
12 actually owned by Centene Center, LLC.

13 **Q** Where is --

14 **A** Which is under CMC Real Estate Company, LLC.

15 **MR. KAISER:** It's right here, Dave.

16 **THE WITNESS:** Centene Plaza, LLC, is
17 actually an inactive entity.

18 **QUESTIONS BY MR. LANGENFELD:**

19 **Q** So the building we're in is owned by Centene
20 Center?

21 **A** Yes.

22 **Q** And where is Centene Company of Texas?

23 **A** It is right here.

24 **Q** It's here; correct?

25 **A** Yes.

1 Q Would you go ahead and circle it on the
2 exhibit? Thank you.

3 And so Centene Company of Texas is a
4 subsidiary of CCTX Holdings?

5 A Yes.

6 Q And also of Centene Holding, LLC?

7 A Correct.

8 Q And both of those appear to go up directly
9 to Centene Corporation; is that right?

10 A That's correct.

11 Q So does Centene Company of Texas have any
12 subsidiaries?

13 A No, it does not.

14 Q What subsidiaries exist that actually employ
15 utilization review nurses?

16 A That list was provided; correct?

17 MR. KAISER: It was.

18 **QUESTIONS BY MR. LANGENFELD:**

19 Q Yeah. That's interrogatory number 5.

20 MR. KAISER: Yeah, I don't think she
21 knows --

22 THE WITNESS: I don't know that off the top
23 of my head, all of those companies.

24 **QUESTIONS BY MR. LANGENFELD:**

25 Q Okay. Let me show you -- let me ask you

1 just to take a look at the response to interrogatory
2 number 5.

3 **MR. KAISER:** This would be the
4 interrogatories that are signed by Centene
5 Corporation.

6 **THE WITNESS:** Okay.

7 **QUESTIONS BY MR. LANGENFELD:**

8 **Q** You've had a chance to look at Centene
9 Corporation's answer to interrogatory number 5?

10 **A** Yes.

11 **Q** And as you read through that, are there any
12 other subsidiaries that employ utilization review
13 nurses that come to mind?

14 **A** Not that I'm aware of, no.

15 **Q** Would you do me a favor on that exhibit and
16 go ahead and circle all of the entities or
17 subsidiaries that are identified in number 5?

18 **A** Sure.

19 **Q** Thank you. So it would appear that -- so
20 Centene Management Company employs utilization
21 review nurses; correct?

22 **A** Correct.

23 **Q** But none of its subsidiaries do?

24 **A** Correct.

25 **Q** Bankers Reserve employs utilization review

1 nurses, and it is a subsidiary of Centene
2 Corporation and no other entity; is that right?

3 **A** Correct.

4 **Q** Bridgeway Health Solutions of Arizona
5 employs utilization review nurses and it's a
6 subsidiary of Bridgeway Health Solutions, CenCorp
7 Health Solutions and Centene Corporation?

8 **A** Correct.

9 **Q** What's the other one that I'm moving
10 towards?

11 **A** It's Nurtur Health, Inc.

12 **Q** Okay. And so Nurtur Health, Inc., is a
13 subsidiary of CenCorp Health Solutions and Centene
14 Corporation?

15 **A** Correct.

16 **Q** Is it a subsidiary of the entity right above
17 it, Cenpatico of Florida?

18 **A** No.

19 **Q** NovaSys Health, Inc. --

20 **A** Yes.

21 **Q** -- employs utilization review nurses, and it
22 appears to be a subsidiary of Celtic Group, Inc.?

23 **A** Correct.

24 **Q** And Centene Corporation?

25 **A** Correct.

1 Q And no other entity.

2 A Correct.

3 Q And then Centene Company of Texas is a
4 subsidiary of CCTX Holding, LLC?

5 A Correct.

6 Q And Centene Holding, LLC?

7 A Correct.

8 Q And also a subsidiary of Centene
9 Corporation?

10 A Correct.

11 Q Do you know whether Centene Management
12 Company provides management services to any of
13 these -- when I say these, I'm talking about the
14 ones we just referred to -- does Centene Management
15 Company provide management services to any of these
16 other subsidiaries other than Centene Company of
17 Texas?

18 A Bankers Reserve Life Insurance Company of
19 Wisconsin.

20 Q Any others?

21 A No.

22 Q But obviously it does to Texas, and so that
23 leaves three. Nurtur Health, Inc., that does not
24 receive management services from Centene Management
25 Company?

1 **A** Correct.

2 **Q** Bridgeway Health Solutions of Arizona does
3 not receive management services from Centene
4 Management Company?

5 **A** Correct.

6 **Q** And nor does NovaSys Health, Inc., of
7 Delaware; is that right?

8 **A** Correct.

9 **Q** Who provides their management services?

10 **A** They have their own employees.

11 **Q** They do that inhouse. So the employees you
12 just referenced, are those the employees that
13 provide the management services for those
14 subsidiaries? In other words, I asked you who
15 provides their management services and you told me
16 they have their own employees.

17 **A** Correct.

18 **Q** Their own employees then provide those
19 management services, is that what you meant?

20 **A** Yes.

21 **Q** Okay.

22 **MR. KAISER:** Just a point that might be
23 helpful, because Miss Dinkelman is wearing two hats.
24 She's wearing both the -- providing answers both on
25 behalf of Centene Corporation and on behalf of